REMARKS

In view of the foregoing amendments and following remarks, reconsideration and allowance of this application are requested. Claims 1-11, 13-16, 31-50, 63-68, 70-74, 76-80, and 82-99 are pending, with claims 1, 10, 67, 73, and 79 being independent. Claims 69, 75, and 81 have been cancelled, and claims 31, 67, 71, 73, 79, and 83 have been amended by this reply, with claims 67, 73, and 79 being amended to include the limitations of claims 69, 75, and 81 respectively. Claims 85-99 have been added.

Interview Summary

Applicant would like to thank Examiner Huynh and Primary Examiner Hong for the courtesies extended to Applicant's representatives during the personal interview conducted on June 20, 2003. The foregoing amendments and the following remarks reflect the substance of the interview. In particular, claims 85-99 have been added as discussed at the interview.

Claim Objections

Objections were made to claims 31, 71, and 83 as being of improper dependent form. These objections have been rendered moot by the amendment to claims 31, 71, and 83. It is respectfully requested that the objections be withdrawn. These amendments correct a typographical error and are not related to patentability.

An objection was made to claims 69, 75, and 81 due to an informality. This objection has been rendered moot by the cancellation of claims 69, 75, and 81.

35 U.S.C. § 103(a) Shaw et al. Rejection

Claims 1-4, 9-11, 13-16, 63-68, 70-74, 76-80, and 82-84 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaw et al., Microsoft Office 6-in-1, Que Corporation, 1994 ("Shaw"). This rejection is respectfully traversed.

Claim 1 recites encapsulating within a single file at least two objects, where each object includes data for the object and choreography information. The choreography information is

defined by a document author and comprises data defining an explicit relationship between the objects within a multimedia document to dictate a temporal order of presentation between the objects.

Shaw does not teach or suggest encapsulating within a single file at least two objects where each object includes data for the object and choreography information, as recited in claim 1. Moreover, there is no motivation to modify Shaw to include these features of claim 1.

Similarly to claim 1, claims 10, 67, 73, and 79 each recite at least two objects encapsulated within a single file, where each object includes data for the object and choreography information. As discussed with respect to claim 1, Shaw does not teach or suggest at least these features of claims 10, 67, 73, and 79.

Claims 2-4, 9,11, 13-16, 63-66, 68, 70-72, 74, 76-78, 80, and 82-84 each depend from one of claims 1, 10, 67, 73, and 79 and are believed to be allowable for at least the reasons given for claims 1, 10, 67, 73, and 79.

It is respectfully submitted that Shaw does not establish a *prima facie* case of obviousness with regard to claims 1-4, 9-11, 13-16, 63-68, 70-74, 76-80, and 82-84. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

35 U.S.C. § 103(a) Shaw et al./Caire et al. Rejection

Claims 31-50 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaw in view of U.S. Patent No. 5,663,962 ("Caire"). This rejection is respectfully traversed.

Claims 31-40 depend from claim 1. Claims 41-50 depend from claim 10. For that reason, the following remarks are directed primarily to features recited by claims 1 and 10.

Caire is directed to a method for multiplexing streams of audio-visual signals coded according to the MPEG1 standard. A time-division multiplexing process is used to construct a stream of packets, where each packet contains a single type of data. See Caire at col. 1, l. 65 to col. 2, l. 2. The method involves building a single multiplexed stream from multiple individual elementary streams by continuously deciding, based upon the urgency that data is needed by a demultiplexing buffer, from which elementary stream to select data and form a packet so that the buffer does not become empty. See Caire at abstract; col. 1, ll. 37-45, 52-64; col. 2, ll. 3-9, 45-59; col. 4, l. 66 to col. 5, l. 7; Figs 1, 1A, 7A, 7B. In other words, Caire multiplexes data on the

fly, making adjustments to the arrangement of a presentation based on the communications channel and how full the demultiplexing buffers are at each instance of time.

Caire fails to remedy the deficiencies of Shaw with respect to claims 1 and 10 because, among other things, Caire does not describe or suggest encapsulating within a single file at least two objects where each object includes data for the object and choreography information, as recited in claims 1 and 10. Claims 31-50 thus are allowable by virtue of their dependency, as well as on their own merits.

It is respectfully submitted that Shaw and Caire, either alone or in combination, do not establish a *prima facie* case of obviousness with regard to claims 51-50. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

35 U.S.C. § 103(a) Shaw/Ando Rejection

Claims 7 and 8 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaw, and further in view of U.S. Patent No. 5,600,826 to Ando ("Ando"). Claims 7 and 8 depend from claim 1. This rejection is respectfully traversed.

Ando is directed to a structured data processor for converting between sequential and tree structured data, including a structured data treating unit for editing data. See Ando at col. 4, ll. 25-43; col. 6, ll. 44-47. Ando fails to remedy the deficiencies of Shaw with respect to independent claim 1. Claims 7 and 8 thus are allowable by virtue of their dependency, as well as on their own merits.

It is respectfully submitted that Shaw and Ando, either alone or in combination, do not establish a *prima facie* case of obviousness with regard to claims 7 and 8. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

35 U.S.C. § 103(a) Shaw/Johnson Rejection

Claims 5 and 6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaw, and further in view of U.S. Patent No. 5,892,847 to Johnson ("Johnson"). Claims 5 and 6 depend from claim 1. This rejection is respectfully traversed.

Johnson is directed to a method and apparatus for compressing images, including an encoder that that created a file format that layers the compressed image. See Johnson at col. 4, ll. 30-49. Johnson fails to remedy the deficiencies of Shaw with respect to independent claim 1. Claims 5 and 6 thus are allowable by virtue of their dependency, as well as on their own merits.

It is respectfully submitted that Shaw and Johnson, either alone or in combination, do not establish a *prima facie* case of obviousness with regard to claims 5 and 6. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.